

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)
Plaintiff,)
vs.) No. 4:14 CR 290 RWS (DDN)
ROBERT VAN)
Defendant.)

DEFENDANT'S MOTION TO RECONSIDER DETENTION

Comes now Defendant Robert Van, through his attorney, Brocca L. Morrison, Assistant Federal Public Defender, and moves for reconsideration of the Detention Order issued on April 16, 2014. In support of this motion, Van states the following:

1. Van pled guilty to one count of possession of a firearm on June 27, 2014 and is requesting a bond after his plea because the following circumstances have changed: Van is eligible for a bond because his state case regarding the same conduct was dismissed and Van believes his previously diagnosed and treated colon cancer is worsening based on symptoms he is currently experiencing.
2. If released on bond until his sentencing, with the condition of electronic monitoring, Van will reside with Sena Torrence at 1329 Marcus Ave., St. Louis, MO 63113.
3. Van will not present a risk to the court or the community if released, as he acknowledged in his plea agreement that any noncompliance with the agreement will result in a higher penalty in this case.
4. Van is requesting he be released on bond in order to receive the medical care he believes is necessary regarding his current health conditions. Van was recently moved to Saint Louis County in order to receive further medical care, including a scan to assess the growth, if any, of the cancer. The head nurse at the jail has

communicated to counsel that he will be provided such treatment upon approval from the United States Marshal's Office, which is currently pending.

5. The Defendant's family can post a bond of \$1,000.00.
6. The Government is opposed to a bond.

WHEREFORE, Defendant Van respectfully requests that the Court reconsider the previously issued Detention Order and release him on bond under any conditions the Court deems appropriate until his sentencing.

Respectfully submitted,

/s/ Brocca L. Morrison
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CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2014, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Sayler Fleming and Mr. Patrick Judge, Assistant United States Attorneys.

/s/ Brocca L. Morrison
BROCCA L. MORRISON
Assistant Federal Public Defender